

Massachusetts has original jurisdiction over this action because it is a civil action wherein the amount in controversy exceeds the sum or value of \$75,000 exclusive of interest and costs, is between citizens of different states, the defendant is not a citizen of the state in which the action is brought, and the cause of action arises out of an employment dispute involving work performed throughout New England, including Massachusetts.

5. As alleged in the Complaint, plaintiff is a New Hampshire resident who resides at 17 Sunny Meadow Road, Atkinson, New Hampshire, 03811.

6. Defendant is a Texas limited liability company with a principal place of business at 4634 South Presa Street, San Antonio, Texas 78223.

7. As alleged in the Complaint, plaintiff was hired by defendant to perform work throughout New England, including Massachusetts.

8. As alleged in the Civil Action Cover Sheet accompanying the Complaint, Zavalianos is seeking damages of \$753,015, an amount in excess of the sum or value of \$75,000, exclusive of interest and costs.

9. The United States District Court for the District of Massachusetts is the District Court for the United States encompassing the place where the action is pending, and is the Court to which this action may be removed pursuant to 28 U.S.C. §1441.

**SOUTHERN FOLGER DETENTION
EQUIPMENT COMPANY, LLC,**

By its attorneys,



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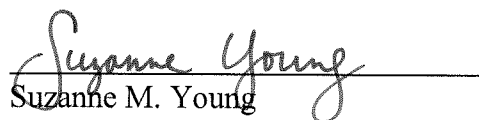
syoung@zelmcd.com

Dated: December 10, 2010

CERTIFICATE OF SERVICE

I, Suzanne M. Young, hereby certify that on December 10, 2010, a true and accurate copy
of the foregoing was served by hand upon the following:

Elayne N. Alanis
Law Office of Elayne N. Alanis
10 Tremont Street, Third Floor
Boston, MA 02108


Suzanne M. Young